

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF GEORGIA
ATLANTA DIVISION**

JILL ALTMAN, Individually and on)	
behalf of a class,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:15-cv-02451-SCJ-
)	CMS
WHITE HOUSE BLACK MARKET,)	
INC., and DOES 1-10,)	
)	
Defendants.		

JOINT MOTION TO AMEND SCHEDULING ORDER

COME NOW Plaintiff, Jill Altman (“Plaintiff”), and Defendant, White House Black Market, Inc. (“WHBM”) (collectively, the “Movants”), pursuant Fed. R. Civ. P. 6(b) and 16(b)(4), and move the Court to amend the scheduling order in this action. As grounds for this motion, Movants state as follows:

1. Pursuant to the amended scheduling order entered on October 13, 2016 (Doc. 41), Plaintiff’s motion for class certification is due on January 31, 2017; WHBM’s deadline to oppose class certification is March 2, 2017; Plaintiff’s deadline to file her reply in support of class certification is March 23, 2017; the deadline to complete fact discovery is June 30, 2017; the deadline to hold a settlement conference is July 14, 2017; the deadline to move for summary judgment is July 31, 2017; the deadline to file a brief in opposition to a motion for

summary judgment is August 30, 2017; and the deadline to file a reply brief in support of a motion for summary judgment is September 20, 2017.

2. Movants have exchanged written discovery, including discovery relevant to class certification. While Movants have had disputes over the scope of discovery, they have sought to resolve those disputes without resorting to seeking the intervention of the Court. Following their discussions, Movants are continuing towards resolving the discovery dispute by each preparing amended responses now. However, at this stage it is likely that these amended responses will be exchanged, at best, shortly before the deadline for Plaintiff to move for class certification.

3. Moreover, the parties are engaged in settlement negotiations, which, if successful, will resolve this matter without the need for further discovery or motion practice (excepting motion practice related to settlement approval).

4. Good cause therefore exists to extend the deadlines to move for class certification, to complete discovery and to move for summary judgment, in order to enable the parties sufficient time to attempt to settle this matter and, if that fails, to complete discovery regarding class certification prior to briefing the issue.

WHEREFORE, the Movants respectfully pray that the Court enter an Order amending the existing scheduling order as follows:

a. Plaintiff's deadline to move for class certification shall be moved to April 26, 2017.

b. WHBM's deadline to oppose class certification shall be moved to May 26, 2017.

c. Plaintiff's deadline to file her reply in support of class certification shall be moved to June 16, 2017.

d. The deadline to complete fact discovery shall be moved to September 29, 2017.

e. The deadline to hold a settlement conference shall be moved to October 13, 2017.

f. The deadline to file motions for summary judgment shall be moved to November 3, 2017.

g. The deadline to file briefs in opposition to any motion for summary judgment shall be moved to December 4, 2017.

h. The deadline to file reply briefs in further support of any motion for summary judgment shall be moved to December 22, 2017.

The proposed adjusted deadlines represent a 90-day extension of the current deadlines in this action and is the second proposed extension of deadlines in this case. To the extent the Court has any questions or concerns regarding the proposed

amendments to the schedule, the Movants propose a conference to discuss the amendments and the rationale for them.

Respectfully submitted,

/s/ Bryant T. Lamer

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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which electronically delivered a copy to the parties listed below.

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D

Pursuant to Local Rule 7.1D, the undersigned counsel certifies that this document has been prepared using 14 Times New Roman point font.

By: /s/ Bryant T. Lamer
An Attorney for Plaintiff